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FILED
CLERK, U.S. DISTRICT COURT
5/22/18
CENTRAL DISTRICT OF CALIFORNIA
BY: CS DEPUTY

3 Attorneys for Plaintiff
4 Securities and Exchange Commission

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New York, New York 10281

LODGED
CLERK, U.S. DISTRICT COURT
5/22/18
CENTRAL DISTRICT OF CALIFORNIA
BY: CS DEPUTY

7 Robert A. Cohen, Unit Chief (Cyber Unit)
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9 Washington, District of Columbia 20549

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14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA**
16 **WESTERN DIVISION**

17 **SECURITIES AND EXCHANGE**
18 **COMMISSION,**

19 **Plaintiff,**

20 **vs.**

21 **TITANIUM BLOCKCHAIN**
22 **INFRASTRUCTURE SERVICES,**
23 **INC.; EHI INTERNETWORK AND**
24 **SYSTEMS MANAGEMENT, INC.**
25 **aka EHI-INSM, INC.; and MICHAEL**
26 **STOLLAIRE,**

27 **Defendants.**
28

Case No. **CV18-4315-DSF(JPRx)**
DECLARATION OF DANIEL
PIROLO

1 **DECLARATION OF DANIEL PIROLO**

2 I, Daniel Pirolo, declare, pursuant to 28 U.S.C. § 1746, as follows:

3 1. I am employed by Synchrony Financial (“Synchrony”) as a Senior Vice
4 President, Senior Counsel, Technology and Intellectual Property. My responsibilities
5 include, among other things, overseeing the protection of Synchrony’s trade name,
6 trademarks, and service marks from infringement and other unauthorized uses by
7 third parties. I have personal knowledge of the matters set forth below and, if called
8 as a witness, would testify to these facts under oath.

9 2. I make this declaration at the request of the United States Securities and
10 Exchange Commission (“SEC”).

11 3. Synchrony is a consumer financial services company and a provider of
12 private label credit cards in the United States. Until July 2014, Synchrony was
13 wholly owned by the General Electric Company (“GE”) at which time Synchrony
14 became a separate publicly-traded company.

15 4. On or about February 7, 2018, the SEC requested that Synchrony
16 provide it with certain information concerning companies called Titanium Blockchain
17 Infrastructure Services, Inc. (“TBIS”) and EHI Internetwork and Systems
18 Management, Inc. (“EHI”), and an individual named Michael Stollaire aka Michael
19 Stollery or Michael Stoller (“Stollaire”). Specifically, the SEC inquired whether
20 Synchrony has ever had a business relationship with EHI, TBIS, or Stollaire, and
21 whether EHI, TBIS, or Stollaire has ever been authorized to use the name or logo of
22 Synchrony in marketing materials.

23 5. In response to the SEC’s request, Synchrony personnel reviewed the
24 books, records, files, and computer systems of the business units within Synchrony
25 that might reasonably be expected to have or to have had a business relationship with
26 TBIS, EHI, or Stollaire, including as a customer, client, vendor, employee,
27 contractor, consultant, or other type of business transaction. The information
28 contained in this declaration is based on my conversations with Synchrony personnel

1 and my review of documents and information provided to me by Synchrony
2 personnel, including business records that were kept in the course of Synchrony's
3 business and prepared at or near the time of the occurrence of the matters described in
4 this declaration. Because this declaration is prepared for limited purposes, I have not
5 set forth every fact that I have learned in connection with these conversations or my
6 review of documents and information provided to me.

7 6. My review of documents and information provided to me by Synchrony
8 personnel has not disclosed any current or past direct business relationship between
9 Synchrony and TBIS, EHI, or Stollaire.

10 7. My review of documents and information provided to me by Synchrony
11 personnel indicates that prior to Synchrony's separation from GE in 2015, GE
12 engaged the services of a third-party contractor to provide certain information
13 technology ("IT") services to GE businesses, including Synchrony. These materials
14 indicate that Stollaire worked on the IT services as a fourth-party supplier engaged by
15 the contractor between approximately January 2015 and April 2016, at which time
16 Stollaire's involvement ceased. These materials indicate the scope of the IT services
17 involved the use of commercially available Hewlett Packard IT products and services
18 used by Synchrony, and did not include blockchain technology or digital currency.

19 8. The SEC provided Synchrony with a purported testimonial attributed to
20 "Jill Temple, Project Manager, IT Infrastructure Synchrony Financial" that appeared
21 on the EHI website. My review of documents and information provided to me by
22 Synchrony personnel showed that Ms. Temple is an employee of Synchrony who
23 works in IT and that the language of the purported testimonial is substantially similar
24 to an internal email Ms. Temple sent a colleague at Synchrony on which Stollaire was
25 copied. The publication of a modified version of this email on the EHI website in the
26 form of a purported testimonial was not authorized by Synchrony.

27 9. My review of documents and information provided to me by Synchrony
28 personnel has not disclosed that Synchrony₂ has authorized TBIS or EHI or Stollaire

1 to use Synchrony's name or logo in their marketing or advertising or for any other
2 purpose. Synchrony's name and logo are the intellectual property of the company.
3 Synchrony considers a third-party's unauthorized use of the "Synchrony Financial"
4 name or logo in marketing or advertising as an infringement of its intellectual
5 property.

6 10. Synchrony sent Stollaire a cease and desist letter on March 13, 2018, a
7 true and correct copy of which is attached hereto as Exhibit 1.

8 I declare under penalty of perjury under the laws of the United States of
9 America that the foregoing is true and correct.

10 Executed this 15th day of March, 2018 at Stamford, Connecticut.

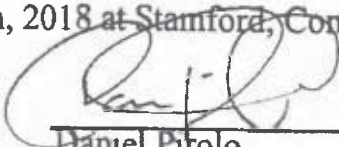
11 
12 _____
13 Daniel Pirolo
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EXHIBIT 1



Lawrence E. James, Jr.
Direct Phone: +1 312 207 2819
Email: ljames@reedsmith.com

Reed Smith LLP
10 South Wacker Drive
Chicago, IL 60606-7507
Tel +1 312 207 1000
Fax +1 312 207 6400
reedsmith.com

March 13, 2018

VIA UPS OVERNIGHT DELIVERY AND EMAIL (info@tbis.io)

Mr. Michael Stollaire/Stollery, CEO
Titanium Blockchain Infrastructure Services;
EHI Internetwork and Systems Mgmt., Inc.
15027 Dickens St., Apt. 4
Sherman Oaks, California 91403

Re: Unauthorized Use of Synchrony's Intellectual Property

Dear Mr. Stollaire/Stollery:

We represent Synchrony Financial Corporation ("Synchrony") with respect to certain intellectual property matters. Synchrony recently discovered that two companies registered in your name, Titanium Blockchain Infrastructure Services Inc. ("TBIS") and EHI Internetwork and Systems Management, Inc. ("EHI"), are making unauthorized uses of Synchrony's federally protected trademark in order to promote TBIS's and EHI's various services. *See Exhibit A.* Specifically, TBIS and EHI are using Synchrony's logo without authorization to promote their services by falsely claiming that Synchrony is a client of TBIS's "sister company," EHI, and falsely implying that Synchrony will soon become a client of TBIS's. *See Exhibit B.* Moreover, EHI's website is misusing a quotation from a Synchrony employee, Jill Temple, in violation of a confidentiality agreement. *See Exhibit C.* Synchrony is concerned that TBIS's and EHI's unauthorized uses of its trademark will mislead consumers into believing that TBIS and EHI are somehow endorsed, or sponsored, by Synchrony.

Synchrony corporate policy does not permit third parties to advertise or promote an association or business relationship with Synchrony without its prior written consent. A review of Synchrony's records confirms that Synchrony has not granted permission to TBIS or EHI to use Synchrony's name or its trademarks, or to act on its behalf in this capacity. Furthermore, the mere fact that Synchrony had previously worked with you does not give you the right to use Synchrony's marks to falsely imply Synchrony's endorsement of, or an affiliation with, you, TBIS and/or EHI. Accordingly, Synchrony is concerned that TBIS's and EHI's unauthorized uses of its trademark are misleading and likely to confuse Synchrony's customers into believing that TBIS's and EHI's services are affiliated with Synchrony. Moreover, Synchrony believes that such use will likely diminish and dilute the distinctive quality of Synchrony's trademarks. Synchrony is also concerned that EHI's unauthorized use of a quotation from a Synchrony employee out of context and in violation of a confidentiality agreement, will add to the confusion among consumers who are misled to believe that Synchrony is associated with, or endorsing, EHI.

Synchrony prefers an amicable resolution to this matter. Moreover, the law requires that an intellectual property owner police the use of its rights in order to protect its rights and to avoid potential

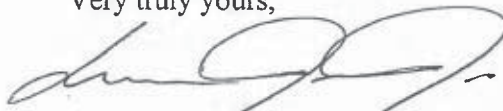
Mr. Michael Stollaire
March 13, 2018
Page 2

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customer confusion. As a result, Synchrony cannot permit the unauthorized uses of its trademark and the breach of a confidentiality agreement to continue. Accordingly, in order to resolve this matter, Synchrony requests that TBIS and EHI permanently cease all uses of Synchrony's trademarks and intellectual property in any manner, and also cease the use and attribution of any quotations from Synchrony employees.

Please indicate TBIS's and EHI's agreement with these requests by signing and returning a copy of this letter by March 27, 2018. Please contact me at your earliest convenience if you have any questions or concerns. We look forward to hearing back from you soon.

Very truly yours,



Lawrence E. James, Jr.
REED SMITH LLP

AGREED and ACCEPTED this ____ day of _____, 2018.

TITANIUM BLOCKCHAIN INFRASTRUCTURE SERVICES, INC.

By: _____

Name: _____

Title: _____

EHI INTERNETWORK AND SYSTEMS MANAGEMENT, INC.

By: _____

Name: _____

Title: _____

Exhibit A



Alex Padilla California Secretary of State

Business Entities (BE)

Business Search - Entity Detail

Online Services

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[File Corporation Statement of Information](#)

[Business Search](#)

[Current Processing Dates](#)

[Disclosure Search](#)

[Service Options](#)

[Name Availability](#)

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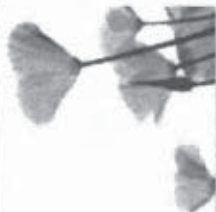
The California Business Search is updated daily and reflects work processed through Monday, February 19, 2018. Please refer to document [Processing Times](#) for the received dates of filings currently being processed. The data provided is not a complete or certified record of an entity. Not all images are available online.

C2340630 EHI INTERNETWORK AND SYSTEMS MANAGEMENT, INC.

Registration Date:	03/27/2001
Jurisdiction:	CALIFORNIA
Entity Type:	DOMESTIC STOCK
Status:	ACTIVE
Agent for Service of Process:	MICHAEL STOLLERY 15027 DICKENS STREET, SUITE 4 SHERMAN OAKS CA 91403
Entity Address:	15027 DICKENS STREET, SUITE 4 SHERMAN OAKS CA 91403
Entity Mailing Address:	15027 DICKENS STREET, SUITE 4 SHERMAN OAKS CA 91403



Alex Padilla California Secretary of State



Business Entities (BE)

Q Business Search - Entity Detail

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C4073241 TITANIUM BLOCKCHAIN INFRASTRUCTURE SERVICES INC.

Registration Date:	10/10/2017
Jurisdiction:	CALIFORNIA
Entity Type:	DOMESTIC STOCK
Status:	ACTIVE
Agent for Service of Process:	MICHAEL ALAN STOLLERY 15027 DICKENS ST APT 4 SHERMAN OAKS CA 91403
Entity Address:	15027 DICKENS ST APT 4 SHERMAN OAKS CA 91403
Entity Mailing Address:	15027 DICKENS ST APT 4 SHERMAN OAKS CA 91403

Exhibit B

About Us

Today the largest and most successful company in the world owns no cars (Uber), the largest hospitality company on the face of the planet owns no hotels (Airbnb), the largest retailer has no brick and mortar (Amazon), and the world's most popular media network creates no content (Facebook). Clearly, we are living in a time of radical change. Why should internet infrastructure be any different?

The FHI Advantage

Until so 1999's of blockchain start-up and initial coin offerings (ICOs), the Titanium Core team and composed of relative newcomers to the technology. In stark contrast, the Titanium Core team has over 100 years of combined experience in the industry. Also not the first technology company that Titanium's founder and CEO, Michael Stollare, has ever formed. In 1999, Mr. Stollare founded FHI, a technology consultancy, specializing in enterprise infrastructure management.

FHI and its consultants are known in the industry as top tier, elite not normal, as shown by the impressive client list and testimonials. Most blockchain start-ups and ICOs face a very serious problem after they develop a viable product and/or service: finding companies and people that will actually purchase them and use them.

At Titanium Core we solve this problem. As FHI's client company, Titanium will bring the all FHI's clients, and since FHI's customers are a trusted source of excellent customer service and performance, Titanium will also be held in high regard.

What follows is a brief excerpt of some of FHI's customers, which Titanium will cover again immediately.



As you can see, the Titanium project had a huge advantage over other Blockchain start-ups and ICOs, before anyone on the Titanium Team ever lifted a finger.

Titanium Blockchain Infrastructure Services Inc.
13077 Dakers Street, Suite 200 North Hollywood, CA 91603, USA
info@titanium-fhi.com / @TITANIUM

Our Clients

Nothing says more than our clients experience with EHL.

We have had the pleasure of working with global leaders in various industries. Our ITIL approach to solving business problems with IT solutions is unique, which has allowed us to help our clients to become more successful in their efforts. Don't take our word for it. Just take a look at what some of our clients have said.



Exhibit C

We have had the pleasure of working with global leaders in various industries. Our ITIL approach to solving business problems with IT solutions is unique, which has allowed us to help our clients to become more successful in their efforts. Don't take our word for it. Just take a look at what some of our clients have said.



Honeywell



"I cannot overstate how helpful Mike was over the past couple weeks in supporting the HP uCMB Universal Discovery (UD) project, specifically for the scan testing that we needed to complete in a hurry for our test phase. I had to ask a lot of his time over several test sessions. He was very helpful, was available when needed and contributed the subject matter expertise in running and evaluating the HP Performance Manager reports as well. Thanks for his support!!"

Jill Temple
Project Manager, Performance Manager, EHLINS